

KIRK B. LENHARD, ESQ., Nevada Bar No. 1437
NIKKI L. BAKER, ESQ., Nevada Bar No. 6562
EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135
Email: klenhard@bhfs.com
Email: nbaker@bhfs.com

DENNIS H. HRANITZKY, ESQ. (admitted *pro hac*)
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036-6797
Telephone: 212.698.3500
Facsimile: 212.698.3599
Email: dennis.hranitzky@dechert.com

Attorneys for Plaintiff NML Capital Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR NML TO
FILE RESPONSE TO NON-PARTY M.F.
CORPORATE SERVICES (NEVADA)
LIMITED'S MOTION FOR PROTECTIVE
ORDER STAYING EFFECT OF MARCH
16 ORDER PENDING RESOLUTION OF
OBJECTION AND MOTION TO CLARIFY
(DKT. #117)**

(FIRST REQUEST)

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq., and Nikki L. Baker, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq., of Dechert LLP, and non-parties MF Corporate Services (Nevada) Limited ("MF Nevada") (collectively, MF Nevada and NML are referred to as the "Parties"), by and through its attorney of record, Kent P. Woods, Esq., of Woods Erickson & Whitaker LLP, hereby agree and stipulate, subject to the Court's approval, as follows:

1 1. On March 16, 2015, Magistrate Judge Ferenbach issued an order granting in part
2 and denying in part MF Nevada's Motion to Quash (Dkt. #14), granting in part and denying in
3 part NML's Counter Motion to Compel (Dkt. #60), denying Non-Party Val de Loire's ("VDL")
4 Motion to Quash (Dkt. #1), and granting NML's Counter Motion to Compel (Dkt. #10) (the
5 "Order"). (Dkt. #101.) Any objection to the Order was due on or by March 30, 2015. (*See*
6 Local Rule IB 3-1.);

7 2. On March 30, 2015, Intervenor Mossack Fonseca & Co. ("Mossack Fonseca")
8 filed a Motion to Intervene (Dkt. #106), MF Nevada and Ms. Amunategui filed an Objection to
9 Magistrate's Order Pursuant to Fed. R. Civ. P. 72 ("MF Objection") (Dkt. #107) and a Motion to
10 Clarify the Court's Order (Dkt. #108), and VDL filed an Objection to Magistrate Judge's Order
11 Pursuant to Fed. R. Civ. P. 72 ("VDL Objection") (Dkt. #109);

12 3. Thereafter, counsel for NML began discussions with counsel for Mossack Fonseca
13 and MF Nevada regarding compliance with the Order. However, the Parties were unable to reach
14 a resolution by the Court imposed deadline for submission of a stipulation providing a schedule
15 for compliance with its Order;

16 4. Therefore, on April 17, 2015, MF Nevada filed a Motion for Protective Order
17 Staying Effect of March 16 Order Pending Resolution of Objection and Motion to Clarify
18 ("Motion to Stay"). (Dkt. #117). NML's response to the Motion to Stay is currently due
19 Monday, May 4, 2015;

20 5. The Parties are still actively discussing whether they can reach a resolution
21 regarding compliance with the Court's March 16, 2015, Order, but have been unable to reach a
22 resolution to date;

23 6. In order to preserve the Parties' time and resources during these discussions, Mr.
24 Woods, on behalf of MF Nevada, has agreed to extend the deadline for NML to file its response
25 to the Motion to Stay 10 calendar days, or up to and including May 14, 2015; and

26 ///

27 ///

28 ///

7. In light of the foregoing, the Parties submit that good cause exists for the Court to approve this stipulation, and respectfully request that the Court extend the deadline for NML to respond to the Motion to Stay for 10 calendar days, or up to and including May 14, 2015.

DATED this 4th day of May, 2015.

WOODS ERICKSON & WHITAKER LLP

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Kent P. Woods

Kent P. Woods, Esq.
Nevada Bar No. 12306
1349 Galleria Drive #200
Henderson, NV 89014

*Attorneys for M.F. Corporate Services
(Nevada) Limited and Patricia Amunategui*

By: /s/ Nikki L. Baker

Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Dennis H. Hranitzky (admitted *pro hac*)
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036-6797

Attorneys for Plaintiff NML Capital, Ltd.

IT IS SO ORDERED.

DATED this 5th of May, 2015.



CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Nikki L. Baker

Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
Attorneys for Plaintiff NML Capital, Ltd.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101